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May 30, 2018

VIA ECF AND ELECTRONIC MAIL

All Counsel of Record

Re: *Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices and Products Liability Litigation*
Case No. 3:16-md-02738-FLW-LHG

Dear Counsel,

By email, I ruled on the request by Imerys for an extension of time to submit its deposition schedule, and to allow depositions to commence in August. This letter sets forth the entire text of my ruling.

I have considered the request made by Imerys for an extension of time to submit the schedule for depositions, and the response to that request by the PSC.

At the outset, I was surprised to receive Imerys' request for an extension, as the defendants have been urging the court to move discovery along in order to permit experts' reports on causation to be submitted without further delay. Nevertheless, I am satisfied that there have been good faith discussions about the schedule and the identification of witnesses. I will therefore grant the request for an extension of time to submit the schedule for the Imerys R. 30(b)(6) depositions until June 8.

However, I do not see the need to delay the taking of those depositions until August. PSC correctly notes that all parties have been working on this phase of the case for many months. I am not persuaded that Imerys is unable to identify and begin to produce witnesses for depositions sooner than August. Of course, there are many "moving parts" to this, and I am certain that depositions will probably go through August in any event.

My conclusion is that depositions of any party's witnesses should begin directly, and to

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the extent Imerys requests that its witnesses not be deposed before August, the request is denied.

So ordered.

Very truly yours,

A handwritten signature in blue ink, appearing to read "J. A. Pisano". The signature is stylized with a large, looped initial "J" and "P".

Joel A. Pisano

cc: Honorable Freda L. Wolfson (via ECF and First-Class Mail)
Honorable Lois H. Goodman (via ECF and First-Class Mail)